

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**TYRONE ISOM JR., ELITE
CLIENTLE INC. and ISOM AND
SOLE INC.,**

Plaintiff,

v.

**MAYOR TIFFANY HENYARD
individually and as Mayor of the Village
of Dolton, INSPECTOR KIM ALSTON,
KEITH FREEMAN, CARMEN
CARLISLE and VILLAGE OF
DOLTON, an ILLINOIS MUNICIPAL
CORPORATION,**

Defendants.

Case No. 24 - cv - 03236

Honorable Manish S. Shah

JOINT STATUS REPORT

NOW COMES the PLAINTIFFS, TYRONE ISOM JR., ELITE CLIENTLE INC., and ISOM AND SOLE INC., and DEFENDANTS, MAYOR TIFFANY HENYARD, INSPECTOR KIM ALSTON, CARMEN CARLISLE and VILLAGE OF DOLTON, and for their Joint Status Report on Discovery as required by this Court's August 26, 2025, minute entry [Dkt. 45], and state as follows:

1. On September 22, 2025, the Court granted the motion to dismiss brought by Defendants Alston, Freeman, and Carlisle; those claims were dismissed without prejudice. Plaintiffs and the Village of Dolton and Mayor Henyard remain.
2. Plaintiff intends to amend to cure the deficiencies identified in the Court's order and respectfully requests 21 days from the date of the Court's acceptance of this Report to file an amended complaint. If the Court prefers, Plaintiff will file a separate motion for leave

to amend. See dismissal order (without prejudice).

3. Written Discovery: Plaintiff and the Village have exchanged written discovery. The Village has produced in excess of 3,000 documents, which Plaintiffs continue to review. (As previously reported.)
4. Individual Defendants: Written discovery directed to the individual defendants was served; responses were deferred during the pendency of the motion to dismiss and the claims against those three defendants have since been dismissed without prejudice.
5. Current schedule: Fact discovery closes November 20, 2025.
6. In light of the intended amendment and the need to conduct depositions keyed to the operative pleadings, Plaintiff respectfully requests a 60-day extension of the fact discovery deadline (to January 20, 2026). If the Court prefers, Plaintiff will file a separate motion.

Respectfully Submitted,

/s/Kenneth Y. Hurst
Kenneth Y Hurst

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CERTIFICATE OF SERVICE

The undersigned non-attorney hereby certifies that the above **Joint Status Report** was filed on October 21, 2025 with the Northern District of Illinois ECF System, serving a copy on all parties.

/s/ Sofia Gisinier

Sofia Gisinier